IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Latashia Chinita Parrott, Debtor Case No. 23-01983-JAW
CHAPTER 13

NOTICE

Debtor has filed papers with the court to incur new debt.

<u>Your rights may be affected.</u> You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court grant the Motion, or if you want the court to consider your views on the Motion, then on or before 21 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk U.S. Bankruptcy Court Thad Cochran U.S. 501 E. Court St., Suite 2.300 Jackson, MS 39201

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

Thomas C. Rollins, Jr. The Rollins Law Firm, PLLC P.O. Box 13767 Jackson, MS 39236 (601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Incur New Debt.

Date: July 18, 2025 Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)

The Rollins Law Firm, PLLC

P.O Box 13767 Jackson, MS 39236 601-500-5533

trollins@therollinsfirm.com

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Latashia Chinita Parrott, Debtor Case No. 23-01983-JAW
CHAPTER 13

MOTION TO INCUR NEW DEBT

COMES NOW, Debtor, by and through counsel, and moves this Court to allow Debtor to incur new debt, and in support thereof, would show the Court as follows:

- 1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on 08/30/2023.
- 2. Debtor is paying approximately 100% to General Unsecured Debts through the plan.
- 3. Debtor does not currently own a vehicle and has been relying on her mother's vehicle to commute to and from work. She is no longer able to use her mother's vehicle and needs to obtain her own.
- 4. A Supplemental Schedule I and J (Dk #85) has been filed evidencing debtor's current income and expenses and demonstrating her ability to make the proposed direct payments for the vehicle loan.
- 5. Debtor wishes to borrow up to \$30,000.00 to purchase a vehicle with an interest rate not to exceed 20.00% and monthly payments not to exceed \$450.00. Debtor will make payments directly to the lender in accordance with the terms of the loan agreement.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MS Bar No. 103469)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the foregoing was forwarded on July 18, 2025, to the creditor, case trustee and U.S. Trustee as indicated in the "21-day notice" that accompanies this Motion.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

| 11 | 23-01963-JAW DKL67 Filed 07/16/25 Effleted 07/16/25 14.35.12 Page 3 01 0 |
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| 4 | UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI |
| 5 | SOUTHERN DISTRICT OF MISSISSIPPI |
| 6 | IN RE: CASE NO: 23-01983-JAW DECLARATION OF MAILING |
| 7 | CERTIFICATE OF SERVICE |
| 8 | Chapter: 13 |
| 9 | |
| 10 | |
| 11 | On 7/18/2025, I did cause a copy of the following documents, described below, |
| 12 | Notice and Motion to Incur New Debt |
| 13 | |
| 14 | |
| 15 | |
| 16 | |
| 17 | |
| 18 | to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with |
| 19 | sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein. |
| 20 | I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice. com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to |
| 21 | Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein. |
| 22 | Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been |
| 23 | served electronically with the documents described herein per the ECF/PACER system. DATED: 7/18/2025 |
| 24 | /s/ Thomas C. Rollins, Jr. Thomas C. Rollins, Jr. 103469 |
| 25 | The Rollins Law Firm |
| 26 | 702 W. Pine Street Hattiesburg, MS 39401 |
| 27 | 601 500 5533 trollins@therollinsfirm.com |
| 28 | |

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| | 23-01983-JAW Dkt 87 Filed 07/18/25 Entered 07/18/25 14:35:12 Page 4 of 6 |
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| 4 | UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI |
| 5 | IN RE: CASE NO: 23-01983-JAW |
| 6 | LATASHIA CHINITA PARROTT CERTIFICATE OF SERVICE |
| 7 | DECLARATION OF MAILING |
| 8 | Chapter: 13 |
| 9 | |
| 10 | |
| 11 | On 7/18/2025, a copy of the following documents, described below, |
| 12 | Notice and Motion to Incur New Debt |
| 13 | |
| 14 | |
| 15 | |
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| 18 | |
| 19 | were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein. |
| 20 | The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above |
| 21 | referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief. |
| 22 | DATED: 7/18/2025 |
| 23 24 | |
| 25 | Wilm While |
| 26 | Miles Wood BK Attorney Services, LLC |
| 27 | d/b/a certificateofservice.com, for Thomas C. Rollins, Jr. |
| 28 | The Rollins Law Firm 702 W. Pine Street |
| | Hattiesburg, MS 39401 |

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USPS FIRST CLASS MAILING RECIPIENTS: Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

LABEL MATRIX FOR LOCAL NOTICING NCRS ADDRESS DOWNLOAD CASE 23-01983-JAW SOUTHERN DISTRICT OF MISSISSIPPI FRI JUL 18 8-33-20 PST 2025

EXCLUDE

(U) NATIONSTAR MORTGAGE LLC

(P) NATIONSTAR MORTGAGE LLC PO BOX 619096 DALLAS TX 75261-9096

MORTCAGE LLC BOX 619096 DALLAS TX 75261 9096

RUSHMORE SERVICING JANET M SPEARS ALDRIDGE PITE LLP

3333 CAMINO DEL RIO SOUTH SUITE 225

SAN DIEGO CA 92108-3808

US BANKRUPTCY COURT THAD COCHRAN US COURTHOUSE 501 E COURT STREET

JACKSON MS 39201-5036

(P) ACCESSONE 2764 PLEASANT ROAD SUITE A 11803 FORT MILL SC 29708-7214

AMERICAN CAR CENTER (CO WESTLAKE PORTFOLIO MANAGEMENT WPM 4751 WILSHIRE BLVD SUITE 100 LOS ANGELES CA 90010-3847

BAPTIST PO BOX 745336 ATLANTA GA 30384-5336

BRIDGECREST ACCEPTANCE CORPORATION PO BOX 29018

PHOENIX AZ 85038-9018

CARE CREDIT PO BOX 71766

ERIC C MILLER ESQ

PHILADELPHIA PA 19179-0001

(P) CONTINENTAL FINANCE COMPANY PO BOX 3220

BUFFALO NY 14240-3220

CREDIT ONE BANK ATTN BANKRUPTCY

LOGS LEGAL GROUP LLP FOR NATIONSTAR MORTGAGE LLC 6801 CIMARRON RD LAS VEGAS NV 89113-2273 1080 RIVER OAKS DRIVE SUITE B-202

FLOWOOD MS 39232-7603

FRANCISCANS MISSIONARI PO BOX 677963 DALLAS TX 75267-7963

(P) JEFFERSON CAPITAL SYSTEMS LLC PO BOX 7999

SAINT CLOUD MN 56302-7999

KIMBERLY D PUTNAM ESQ DEAN MORRIS LLC FOR NATIONSTAR MORTGAGE LLC 1820 AVENUE OF AMERICA MONROE LA 71201-4530

LVNV FUNDING LLC RESURGENT CAPITAL SERVICES PO BOX 10587 GREENVILLE SC 29603-0587

LACKEY MEMORIAL HOSPIT PO BOX 1660 GREELEY CO 80632-1660

MISSISSIPPI SPORTS MEDICINE AND ORTHOPAE CO WAKEFIELD ASSOCIATES LLC PO BOX 51272 KNOXVILLE TN 37950-1272

MISSISSIPPI DEPARTMENT OF REVENUE BANKRUPTCY SECTION PO BOX 22808 JACKSON MS 39225-2808

EXCLUDE

MR COOPER 8950 CYPRESS WATERS BL COPPELL TX 75019-4620 PO BOX 619096

PO BOX 82561 LINCOLN NE 68501-2561

NELNET

M SPEARS CAMINO DEL DIO COUTU DIEGO CA 92108

BOX 3220 BUFFALO NY 14240-3220 US DEPARTMENT OF EDUCATION CO NELNET 121 S 13TH ST LINCOLN NE 68508-1904

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USPS FIRST CLASS MAILING RECIPIENTS:
Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

EXCLUDE

UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE 6 430
JACKSON MS 39201-5022

DEBTOR

LATASHIA CHINITA PARROTT

106 EASTWOOD DR

FOREST MS 39074-3805

THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236-3767

EXCLUDE

TORRI PARKER MARTIN
TORRI PARKER MARTIN CHAPTER 13
BANKRUPT
200 NORTH CONGRESS STREET STE 400
JACKSON MS 39201-1902